



December 28, 2007

Margie Read
Chief Monitoring & Assessment Unit
Irrigated lands Conditional Waiver Program
Central Valley Regional Water Quality Control Board
11020 Sun Center Dr., Suite 200
Rancho Cordova, CA 95670-6114

Re: Comments on tentative Monitoring & reporting Program Order

Dear Ms. Read,

California Citrus Mutual is a citrus producers' trade association with a membership consisting of 2000 family farmers producing citrus on approximately 200,000 acres of land. The majority of our membership farms on the Eastside of the San Joaquin Valley however member exists in all eight citrus producing counties of California.

While relying upon the expertise of others on technical matters associated with water quality CCM has been an equal partner on policy calls. To that end we believe the tentative Monitoring & Reporting Program Plan must take into consideration and therefore avoid a duplication of effort by another agency of government.

Specifically the Department of Pesticide Regulation at EPA has an ongoing and thorough water monitoring program for pesticides. They pioneered the effort and publish annual reports via many forms of media. A duplication of this program is ill advised and a waste of resources in our opinion. We would hope that the Board would consult with DPR for program information and data exchange.

Cordially,

Joel Nelsen
President

cc: George Soares, KS&C

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